

WELSH ROAD LANDFILL SITE  
ADMINISTRATIVE RECORD FILE \* \*\*  
FOR THE UNILATERAL ADMINISTRATIVE ORDER  
INDEX OF DOCUMENTS

1. Report: Welsh Landfill Superfund Site, Chester County, PA, prepared by Dunn, 6/2/92. P. 000001-000041.
2. Report: Revised Specifications for Final Review, Welsh Landfill Superfund Site, Chester County, PA, prepared by U.S. Army Corp of Engineers (USACE), 1/93. P. 000042-000574.
3. Report: Revised Final Design Analysis, Welsh Landfill Superfund Site, Chester County, Pennsylvania, prepared by USACE, 2/93. P. 000575-001416.
4. Letter to Mr. Frank Klanchar, U.S. EPA, from S. L. Carlock, USACE, re: Transmittal of the Final Design documents for the Welsh Road Site, 2/5/93. P. 001417-001418. A December 22, 1992, transmittal record to Mr. Frank Klanchar, U.S. EPA, from Mr. Craig Pennell, USACE, is attached.
5. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. S. L. Carlock, USACE, re: Transmittal of the Final Design documents for Welsh Landfill, 2/5/93. P. 001419-001419.
6. Letter to Mr. James Unruh, CT Corporation, from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 2/6/95. P. 001420-001424.

\* Administrative Record File available 7/14/99.

\*\* All other documents pertaining to the Welsh Road Landfill Site can be found in the Welsh Road Landfill OUI Remedial Administrative Record File dated 2/16/90, and hereby incorporated by reference into this Administrative Record File for the Unilateral Administrative Order Index of Documents.

7. Letter to Mr. Paul O'Neill, Aluminum Company of America (Alcoa), from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 2/6/95. P. 001425-001429.
8. Letter to Ms. Aria Klees, Unisys Corporation, from Ms. Cynthia Nadolski, U.S. EPA, re: Response to a request for information concerning the connection of Unisys Corporation to the Welsh Road Site, 2/24/95. P. 001430-001430.
9. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. James Bollenbacher, Alcoa, re: Request for a meeting to discuss Alcoa's liability in connection with the Welsh Road Site, 3/17/95. P. 001431-001431.
10. Letter to Ms. Aria Klees, Unisys Corporation, from Ms. Cynthia Nadolski, U.S. EPA, re: Transmittal of redacted copies of interview summaries regarding Sperry New Holland, prepared by EPA to support the enforcement efforts against the Potentially Responsible Parties (PRPs), 3/24/95. P. 001432-001432.
11. Letter to Ms. Aria Klees, Unisys Corporation and Mr. James Bollenbacher, Alcoa, from Ms. Cynthia Nadolski, U.S. EPA, re: Request for notification of the intent to participate or not participate in remedial activities at the Welsh Road Site, 6/15/95. P. 001433-001433.
12. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Aria Klees, Unisys Corporation, re: Notification that Unisys declines participation in the implementation of remedial activities, 7/14/95. P. 001434-001436.
13. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. James Bollenbacher, Alcoa, re: Notification that

Alcoa declines participation in the implementation of remedial activities, 7/21/95. P. 001437-001438.

14. Letter to Ms. Grace Barkman from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 2/27/96. P. 001439-001445.
15. Letter to Mr. Ernest Barkman, Ern-Bark, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 2/27/96. P. 001446-001452.
16. Letter to Mr. Ernest Barkman, Bark-Ern, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 2/27/96. P. 001453-001459.
17. Letter to Mr. Ernest Barkman, E. B. Corp., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 2/27/96. P. 001460-001466.
18. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ernest Barkman, E. B. Corp., re: Notification that E. B. Corp. does not have the resources to conduct EPA's remedy or to reimburse EPA's past response costs, 4/19/96. P. 001467-001467.
19. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ernest Barkman, Bark-Ern, Inc., re: Notification that Bark-Ern, Inc., does not have the resources to conduct EPA's remedy or to reimburse EPA's past response costs, 4/19/96. P. 001468-001468.
20. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ernest Barkman, Inc., re: Notification that Ern-

Bark, Inc., does not have the resources to conduct EPA's remedy or to reimburse EPA's past response costs, 4/19/96. P. 001469-001469.

21. Letter to Mr. Frank Klanchar, U.S. EPA, from Ms. Grace Barkman, re: Notification that Ms. Barkman does not have the financial resources to conduct EPA's remedy or to reimburse EPA's past response costs, 4/19/96. P. 001470-001470.
22. Letter to Mr. Paul O'Neill, Alcoa, from Ms. Lois Schiffer, U.S. Department of Justice (U.S. DOJ), re: Notification of Proposed Civil Action against Alcoa, CT Corp., and Barkman, 6/11/96. P. 001471-001472.
23. Letter to Mr. James Unruh, CT Corporation System, from Ms. Lois Schiffer, U.S. DOJ, re: Notification of Proposed Civil Action against Alcoa, CT Corp., and Barkman, 6/11/96. P. 001473-001474.
24. Letter to Mr. Ernest Barkman and Ms. Grace Barkman, Ern-Bark, Inc., Bark-Ern, Inc., and EB Corp., from Ms. Lois Schiffer, U.S. DOJ, re: Notification of Proposed Civil Action against Alcoa, CT Corp., and Barkman, 6/11/96. P. 001475-001477.
25. Letter to Chief Executive Officer, Unisys Corporation, from Ms. Lois Schiffer, U.S. DOJ, re: Notification of Proposed Civil Action against Alcoa, CT Corp., and Barkman, 6/13/96. P. 001478-001479.
26. Letter to Ms. Bernice Corman, U.S. DOJ, from Ms. Aria Klees, Unisys Corporation, re: Notification that Unisys denies involvement with the Welsh Road Site, 6/17/96. P. 001480-001481.
27. Letter to Ms. Bernice Corman, U.S. DOJ, from Mr. James A. Bollenbacher, Alcoa, re: Request for meeting with EPA to discuss Alcoa's limited involvement in the Welsh Road Site, 6/20/96. P. 001482-001482.
28. Letter to Mr. James Bollenbacher, Alcoa, and Ms.

Aria Klees, Unisys Corporation, from Mr. Michael Stiles, U.S. DOJ, re: Request that any information regarding additional potential defendants related to the Welsh Road Site be forwarded to EPA by October 1, 1996, 8/5/96. P. 001483-001484.

29. Letter to Mr. James Bollenbacher, Alcoa and Ms. Aria Klees, Unisys Corporation, from Ms. Cynthia Nadolski, U.S. EPA, re: Transmittal of requested CERCLA files regarding the Welsh Road Site, 8/9/96. P. 001485-001486.
30. Letter to Mr. Mark Kmetz, U.S. DOJ, from Mr. James Bollenbacher, Alcoa, re: Request for unredacted documents containing Earnest Barkman's employee information, 8/15/96. P. 001487-001487.
31. Letter to Mr. James Bollenbacher, Alcoa and Ms. Aria Klees, Unisys Corporation, from Ms. Cynthia Nadolski, U.S. EPA, re: Transmittal of requested CERCLA files regarding the Welsh Road Site, 8/27/96. P. 001488-001489.
32. Letter to Mr. James Bollenbacher, Alcoa, and Ms. Aria Klees, Unisys Corporation, from Mr. Michael Stiles, U.S. DOJ, re: Transmittal of a complaint filed concerning United States v. Ernest Barkman, et al., 9/30/96. P. 001490-001490.
33. Letter to Mr. James Bollenbacher, Alcoa, and Ms. Aria Klees, Unisys Corporation, from Mr. Michael Stiles, U.S. DOJ, re: Confirmation of a November 8, 1996, meeting regarding the results of an investigation to name additional defendants related to the Welsh Road Site, 9/30/96. P. 001491-001491.
34. Letter to Mr. James Bollenbacher, Alcoa, from Mr. Michael Stiles, U.S. DOJ, re: Request that specific information regarding additional defendants be available at the next meeting, 11/15/96. P. 001492-001492.
35. Newspaper article entitled, "Superfund Ensnarers Thousands of Small Firms in a Legal Nightmare, Fueling Overhaul Drive," The Wall Street Journal,

3/19/97. P. 001493-001494.

36. Letter to Mr. John Murray, Dart Container Corporation of Pennsylvania, from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 9/30/97. P. 001495-001503.
37. Letter to Mr. John Nils Hanson, Ecolaire, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 9/30/97. P. 001504-001512.
38. Letter to Mr. Philip Rooney, Waste Management Disposal Services of PA, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 9/30/97. P. 001513-001521.
39. Letter to Mr. Les Reinhardt, Waste Management, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 9/30/97. P. 001522-001530.
40. Letter to Mr. Robert Campbell, Sun Company, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 9/30/97. P. 001531-001539.
41. Letter to Mr. Robert McNeil, Penguin Industries, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special

Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 9/30/97. P. 001540-001548.

42. Letter to Mr. James Hart, Fenchurch, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification of potential liability, "Special Notice" for negotiations regarding remedial action, and demand for payment of costs incurred during response activities, 9/30/97. P. 001549-001557.
43. Letter to Mr. John Nils Hanson, Ecolaire, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA has extended the special notice negotiation moratorium for an additional 60 days, 11/24/97. P. 001558-001559. A December 8, 1997, facsimile transmittal memorandum to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Lisa Charleton, Joy Mining Machinery, is attached.
44. Letter to Mr. Les Rinehardt, Waste Management, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA has extended the special notice negotiation moratorium for an additional 60 days, 11/24/97. P. 001560-001560.
45. Letter to Mr. Philip Rooney, Waste Management Disposal Service of PA, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA has extended the special notice negotiation moratorium for an additional 60 days, 11/24/97. P. 001561-001561.
46. Letter to Mr. Robert Campbell, Sun Company, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA has extended the special notice negotiation moratorium for an additional 60 days, 11/24/97. P. 001562-001562.
47. Letter to Mr. Robert McNeil, Penguin Industries, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA has extended the special

notice negotiation moratorium for an additional 60 days, 11/24/97. P. 001563-001563.

48. Letter to Mr. James Hart, Fenchurch, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA has extended the special notice negotiation moratorium for an additional 60 days, 11/24/97. P. 001564-001564.
49. Letter to Mr. John Murray, Dart Container Corporation of Pennsylvania, from Mr. Abraham Ferdas, U.S. EPA, re: Notification that EPA has extended the special notice negotiation moratorium for an additional 60 days, 11/24/97. P. 001565-001565.
50. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Thomas Haines, Sun Company, Inc., re: Notification that Sun Company denies involvement with the Welsh Road Site, 12/11/97. P. 001566-001566.
51. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Lindsay Howard, Babst, Calland, Clements & Zomnir, re: Request for CERCLA files implicating Ecolaire as a PRP at the Welsh Road Site, 1/9/98. P. 001567-001568.
52. Letter to Lindsay Howard, Babst, Caland, Clements & Zomnir, from Ms. Cynthia Nadolski, U.S. EPA, re: Response to a request for information connecting Ecolaire to the Welsh Road Site, 1/21/98. P. 001569-001570. An undated summary of information EPA has on file connecting Ecolaire to the Welsh Road Site, is attached.
53. Letter to Mr. Christopher Dunsky, Honigman, Miller, Schwartz & Cohn, from Ms. Cynthia Nadolski, U.S. EPA, re: Response to a Freedom of Information Act (FOIA) request regarding the Welsh Road Site and request for information connecting Dart Container Corporation to the Welsh Road Site, 1/21/98. P. 001571-001572. An undated summary of information EPA has on file connecting Dart Container



Corporation to the Welsh Road Site, is attached.

54. Letter to Ms. Noel Birle, Pepper, Hamilton & Scheetz, from Ms. Cynthia Nadolski, U.S. EPA, re: Response to a request for information connecting Unisys Corporation to the Welsh Road Site, 1/22/98. P. 001573-001574. An undated summary of information EPA has on file connecting Unisys Corporation to the Welsh Road Site, is attached.
55. Letter to Mr. Thomas Griffin, Parker, Poe, Adams & Bernstein, from Ms. Cynthia Nadolski, U.S. EPA, re: Response to a request for information connecting Fenchurch, Inc., to the Welsh Road Site, 1/22/98. P. 001575-001576. An undated summary of information EPA has on file connecting Fenchurch, Inc., to the Welsh Road Site, is attached.
56. Letter to Mr. Thomas Haines, Sun Company, Inc., from Ms. Cynthia Nadolski, U.S. EPA, re: Response to a request for information connecting Sun Company, Inc., to the Welsh Road Site, 1/23/98. P. 001577-001578. An undated summary of information EPA has on file connecting Sun Company, Inc., to the Welsh Road Site, is attached.
57. Letter to Mr. Christopher Luning, Riley, Riper, Hollin & Colagreco, from Ms. Cynthia Nadolski, U.S. EPA, re: Response to a request for information connecting Penguin Industries, Inc., to the Welsh Road Site, 1/23/98. P. 001579-001580. An undated summary of information EPA has on file connecting Penguin Industries, Inc., to the Welsh Road Site, is attached.
58. Letter to Mr. Frank Klanchar, U.S. EPA, from Lindsay Howard, Babst, Calland, Clements & Zomnir, re: Notification that Ecolaire does not intend at this time to submit a good faith proposal, 1/27/98. P. 001581-001583.

59. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Christopher Dunskey, Honigman, Miller, Schwartz & Cohn, re: Notification that Dart Container Corporation declines EPA's offer to enter into a consent decree, 1/27/98. P. 001584-001585.
60. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Noel Birle, Pepper, Hamilton & Scheetz, re: Request for additional information regarding additional PRPs for the Welsh Road Site, 1/29/98. P. 001586-001586.
61. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Andrew Levine, Waste Management, re: Notification that Waste Managements is willing to negotiate terms for a consent decree, 1/30/98. P. 001587-001591.
62. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Christopher Dunskey, Honigman, Miller, Schwartz & Cohn, re: Request that Dart Container be removed from the Welsh Road Site PRP list, 2/10/98. P. 001592-001595.
63. Letter to Mr. Christopher Dunskey, Honigman, Miller, Schwartz & Cohn, from Ms. Cynthia Nadolski, U.S. EPA, re: Notification that EPA will not remove Dart Container Corporation from the Welsh Road Site PRP list and transmittal of deposition excerpts that support the listing of Dart Container Corporation on the PRP list, 2/11/98. P. 001596-001598.
64. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Paul Boni, Paul Boni, Esquire, re: Notification of the appropriate address for additional information to be sent, 2/12/98. P. 001599-001599.
65. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Thomas Griffin, Parker, Poe, Adams & Bernstein, re: Notification that Fenchurch, Inc., declines the offer to perform the remedy or to reimburse EPA for past response costs, however, Fenchurch, Inc., remains open to discussions concerning a reasonable resolution, 2/16/98. P. 001600-001605.
66. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Christopher Dunskey, Honigman, Miller, Schwartz & Cohn, re: Request that Dart Container Corporation

be considered a De Micromis waste contributor to Welsh Road Site, 2/16/98. P. 001606-001607.

67. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Noel Birle, Pepper, Hamilton & Scheetz, re: Notification of receipt of witness statements, a cost summary report and a responsiveness summary, 2/17/98. P. 001608-001608.
68. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Thomas Haines, Sun Company, Inc., re: Notification that Sun Company, Inc., does not believe there is a basis for considering the company a PRP, 2/17/98. P. 001609-001610.
69. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Paul Boni, Paul Boni, Esquire, re: Notification that Penguin Industries is willing to pursue negotiations regarding the Welsh Road Site, 2/17/98. P. 001611-001612.
70. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Thomas Haines, Sun Company, Inc., re: Notification that no information was found during Sun Company, Inc.'s internal search regarding waste haulers, 3/10/98. P. 001613-001613.
71. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Noel Birle, Pepper, Hamilton & Scheetz, re: Notification of concern on behalf of Unisys Corp., Alcoa, Fenchurch, Inc. and Penguin Industries, Inc., that scrapping practices have resumed at the Welsh Road Site, 3/11/98. P. 001614-001615.
72. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Lindsay Howard, Babst, Calland, Clements & Zomnir, re: Request that Ecolaire, Inc., be removed from the PRP list, 3/25/98. P. 001616-001618.
73. Letter to Ms. Noel Birle, Pepper, Hamilton & Scheetz, from Mr. Abraham Ferdas, U.S. EPA, re: Request for PRPs to submit good faith offers and negotiate a consent decree for implementation of

proposed response actions, 10/15/98. P. 001619-001620.

74. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Lindsay Howard, Babst, Calland, Clements & Zomnir, re: Reiteration of a request that Ecolaire, Inc., be removed from the PRP list, 10/26/98. P. 001621-001622.
75. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Thomas Griffin, Parker, Poe, Adams & Bernstein, re: Notification of Fenchurch, Inc.'s refusal to submit a good faith offer, refusal to implement the remedy in the Record of Decision (ROD) and willingness to enter into negotiations to settle the dispute over the Welsh Road Site, 10/30/98. P. 001623-001624.
76. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Paul Boni, Paul Boni, Esquire, re: Notification of Penguin Industries, Inc.'s refusal to submit a good faith offer, refusal to implement the remedy in the ROD and willingness to enter into negotiations to settle the dispute over the Welsh Road Site, 11/2/98. P. 001625-001628.
77. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Noel Birle, Pepper, Hamilton & Scheetz, re: Notification of Unisys Corporation's refusal to submit a good faith offer, refusal to implement the remedy in the ROD and willingness to enter into negotiations to settle the dispute over the Welsh Road Site, 11/2/98. P. 001629-001630.
78. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Patricia Shaw, LeBoeuf, Lamb, Greene & MacRae, re: Notification of Alcoa's willingness to enter negotiations concerning liability as it pertains to the Welsh Road Site, 11/2/98. P. 001631-001632.
79. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, re: Notification of a disagreement with EPA regarding Waste Managements liability as a successor to Ernest

Barkman, 12/18/98. P. 001633-001633.

80. Letter to Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, from Ms. Cynthia Nadolski, U.S. EPA, re: Response to inquiry about the liability of Waste Management as successor to Ernest Barkman, 1/6/99. P. 001634-001635.
81. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Thomas Haines, Sun Company, Inc., re: Notification that Sun Company, Inc., refuses to participate in the implementation of the ROD, 3/30/99. P. 001636-001636.
82. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Thomas Griffin, Parker, Poe, Adams & Bernstein, re: Extension of deadlines concerning the Unilateral Administrative Order (UAO) for all PRPs involved with the Welsh Road Site, 4/5/99. P. 001637-001638.
83. Letter to Ms. Cynthia Nadoski, U.S. EPA, from Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, re: Request for a copy of the UAO, 4/6/99. P. 001639-001639.
84. Letter to Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, from Ms. Cynthia Nadolski, U.S. EPA, re: Transmittal of a requested copy of the UAO, 4/6/99. P. 001640-001640.
85. Letter to Mr. Thomas Haines, Sun Company, Inc., from Ms. Cynthia Nadolski, U.S. EPA, re: Transmittal of documents supporting Sun Company, Inc.'s connection to the Welsh Road Site, 4/9/99. P. 001641-001641.
86. Letter to Mr. Peter Schaul, U.S. EPA, from Mr. Stephen Joyce, Waste Management, re: Request for a ten day extension to respond to the Administrative Order, 4/26/99. P. 001642-001644. An April 29, 1999, transmittal letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, is attached.

87. Administrative Order for Remedial Action In The Matter Of: Welsh Road Superfund Site; Ernest Barkman; Grace Barkman; Ern-Bark, Inc.; Bark-Ern, Inc.; E.B. Corp., Inc.; Aluminum Company of America; Dart Container Corporation of Pennsylvania; Ecolaire Incorporated; Fenchurch, Inc.; Penguin Industries, Inc.; Sun Company, Inc. (R&M); Unisys Corporation; Waste Management of Pennsylvania, Inc.; and Waste Management Disposal Services of PA, Inc., Respondents, Docket No. III-99-012-DC, 3/19/99. P. 001645-001717. A March 19, 1999, transmittal letter to "Attached Address List" from Mr. Abraham Ferdas, U.S. EPA, and a March 3, 1999, list of PRPs, are attached.
88. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, re: Notification of intent to comply with the Administrative Order contingent upon EPA's agreement several conditions, 5/13/99. P. 001718-001720.
89. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, re: Comments regarding Waste Management's participation in the good faith offer submitted on May 14, 1999, 5/14/99. P. 001721-001722.
90. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Christopher Dunskey, Honigman, Miller, Schwartz & Cohn, re: Dart Container Corporation's comments on the Administrative Order, 5/14/99. P. 001723-001724.

91. Letter to Mr. Frank Klanchar, U.S. EPA, from Ms. Lindsay Howard, Babst, Calland, Clements & Zomnir, re: Ecolaire Incorporated's comments on the Administrative Order, 5/14/99. P. 001725-001807. The following are attached:
- a) "Exhibit A," a July 26, 1991, letter to Mr. Bowen Hosford, U.S. EPA, from Mr. Howard Voight, Joy Technologies Inc., responding to a June 20, 1991 104(e) letter and transmitting invoices, manifests and other documents pertaining to ash residue waste;
  - b) "Exhibit B," a January 9, 1998, letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Lindsay Howard, Babst, Calland, Clements & Zomnir, requesting information that was discussed during a December 12, 1997, phone conversation;
  - c) "Exhibit C," a January 27, 1998, letter to Mr. Frank Klanchar, U.S. EPA, from Ms. Lindsay Howard, Babst, Calland, Clements & Zonir, notifying EPA of Ecolaire's inability to submit a good faith offer;
  - d) "Exhibit D," a January 28, 1998, letter to Ms. Patricia Shaw, LeBoeuf, Lamb, Greene & MacRae, from Ms. Cynthia Nadolski, U.S. EPA, responding to a January 27, 1998, conference call;
  - e) "Exhibit E," a March 25, 1998, letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Lindsay Howard, Babst, Calland, Clements & Zomnir, requesting that Ecolaire be removed from the PRP list;

- f) "Exhibit F," an October 26, 1998, letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Lindsay Howard, Babst, Calland, Clements & Zomnir, requesting that the EPA remove Ecolaire from the PRP list;
  - g) "Exhibit G," a May 11, 1999, letter to Mr. Joseph O'Dea, Saul, Ewing, Remick & Saul, from Ms. Cynthia Nadolski, U.S. EPA, transmitting of additional PRP search results;
  - h) "Exhibit H," an April 30, 1999, letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Lindsay Howard, Babst, Calland, Clements & Zomnir, transmitting May 4, 1998, testimony of Mr. Samuel Good.
- 92. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Thomas Griffin, Parker, Poe, Adams & Bernstein, re: Notification of Fenchurch, Inc.'s non-compliance with the UAO, 5/17/99. P. 001808-001818. A February 16, 1998, letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Thomas Griffin, Parker, Poe, Adams & Bernstein, responding to EPA's September 30, 1997, letter of Special Notice, is attached.
  - 93. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Mr. Paul Boni, Paul Boni, Esquire, re: Penguin Industries comments on the UAO, 5/17/99. P. 001819-001821.
  - 94. Letter to Ms. Cynthia Nadolski, U.S. EPA, from Ms. Margaret Underwood, Baldwin, Renner, Clark & Buckwalter, re: Barkman's comments on the UAO, 6/3/99. P. 001822-001823.



